

July 31, 2002

Mr. Jack Broadbent
Director, Air Management Division
United States Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

Dear Mr. Broadbent:

The requirements for public and EPA review of the following proposed Major Facility Review Permit have been completed:

Facility #	Facility Name	Application #
A0022	Tosco Refining Company, Contra Costa Carbon Plant	25817

The District received comments from the facility, Golden Gate University Environmental Law Clinic on behalf of Our Children's Earth, and Adams Broadwell Joseph & Cardozo on behalf of Plumbers and Steamfitters Union Local 342.

This permit is the subject of an EPA objection dated May 3, 2002. The objection was based on a comment that this facility and the Phillips 66 Refinery were contiguous and therefore, one facility. The District has concluded that the facilities are indeed contiguous and therefore, are considered one stationary source. We will still proceed and issue two permits to these facilities because they have been managed historically as two facilities. We have prepared an analysis that shows that the facility is only subject to one new requirement due to its association with the Phillips 66 refinery, the requirements of 40 CFR 82, Ozone-Depleting Compounds. The analysis is included in our response to the Adams and Broadwell comments, enclosed.

Based on comments from the above parties, the following corrections and changes have been made to the permit:

- BAAQMD Regulation 8, Rule 16, Solvent Cleaning Operations, has been added to Section III of the permit, Generally Applicable Requirements, in case the facility does any exempt solvent cleaning that is subject to the rule.
- Requirements for the handling of ozone-depleting compounds have been added to Section III of the permit, Generally Applicable Requirements.
- The requirements for sources S41, S42, Sodium Carbonate Storage Silos, and A14, A15, Dry Sorbent Injection Systems, omitted in error, have been added to Sections IV, VI, and VII of the permit. These sources have low emissions and are unlikely to be out of compliance with applicable requirements. Therefore, this is not a substantive change.

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SECRETARY

Ellen Garvey
Air Pollution Control Officer

- The requirements for S32, S33, Internal Combustion Engines have been added to the permit. These are small 87-hp engines that have lost an exemption from District permits. These sources have low emissions and are unlikely to be out of compliance with applicable requirements. Therefore, this is not a substantive change. Monitoring for compliance with Regulation 9-1-304 has been added. Since the engines operate infrequently, no monitoring for Regulation 6 has been added. A requirement for a flow monitor and hourly flow recording has been added to the conditions for S1 and S2, Coke Calcine Kiln/Cooler.
- A requirement for use of fuel meters to measure natural gas usage at the calciner and pyroscrubbers has been added.
- The basis for various monitoring conditions was changed from “cumulative increase” to “BAAQMD Regulation 2-6-409.2.”
- Condition 136, part 9, was changed to make it clear that although the manometer will be operating at all times, the pressure drop will only be observed and recorded once per week.
- EPA Method 9 was deleted from various conditions for visible emissions monitoring because it is incompatible with the District’s standard.
- BAAQMD Regulations 9-1-110.1, 9-1-110.2, and 9-1-310.3, omitted in error, have been added to Table IV-A and IV-B of the permit.
- Conditions 10438 and 10439 have been modified so that the equipment cannot operate without control.

Various minor wording changes were also made in response to comments. For details, see the response to the commentors’ letters, enclosed.

The following corrections and changes have been made to the permit based on the facility’s comments:

- The make of the S-1 burner has been corrected from Coen to Providair.
- The capacity of the S-1 burner has been corrected from 60 MMbtu/hr to 62 MMbtu/hr.
- The description of A10 and A11 has been corrected.

The following changes that were requested by the facility have not been made to the permit for the following reasons:

- No change has been made to the firing rates for A1 and A2, Pyroscrubbers. This change is considered a modification, which requires an application and would be subject to BAAQMD Regulation 2, Rules 1 and 2.
- No change has been made to the capacity of S6, Railcar and Truck Coke Loading Spout, etc. The documentation submitted for the increase of the capacity has a date of 8/23/90. If the facility submits documentation that shows that the capacity of the source was 350 tons/hr before 1979, the District will amend the capacity in the permit using minor modification procedures.

After considering all comments and making appropriate revisions, the District has made a decision to issue this Major Facility Review Permit.

Enclosed for your information is a copy of the final permit, the comment letters, and the responses to comments. If you have any questions regarding this project, please call Steve A Hill, Air Quality Engineering Manager, at (415) 749-4673.

Sincerely yours,

Ellen Garvey, Air Pollution Control Officer

Enclosure

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